



September 13, 2023

VIA CM/ECF

Hon. Denise L. Cote
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Tianhai Lace USA, Inc. v. Zara USA, Inc., et al.*
Civil Action No. 1:23-06597 (DLC)

Dear Judge Cote:

We represent Plaintiff Tianhai Lace USA ("Tianhai"), and respectfully submit this joint letter on behalf of Tianhai and Defendant Zara USA, Inc. ("Zara") to request an adjournment of the pretrial conference scheduled by the Court for October 5, 2023, in the above matter (Dkt. 8). As scheduled, the October 5th conference date creates a deadline for the parties to conduct a Rule 26(f) conference that precedes Zara's deadline to answer Tianhai's Complaint. See Dkt. 10 (waiver of service extending Zara's deadline to respond to complaint to September 29, 2023). The deadline for the parties to conduct the Rule 26(f) conference is currently September 14, 2023. Additionally, the deadline for the parties to submit a joint report and exchange initial disclosures, which is September 28, 2023, also precedes Zara's deadline to respond to Tianhai's Complaint. The parties cannot properly prepare for the Rule 26(f) conference, prepare the joint report, or exchange initial disclosures without the benefit of Zara's response to the Complaint. Lastly, the parties have been discussing a potential resolution of this matter. As such, the parties propose the following agreed-upon schedule:

- October 29, 2023 – Zara's Response to Complaint Due (30-day extension from current September 29, 2023 deadline)
- November 12, 2023 – Rule 26(f) Conference Deadline
- November 26, 2023 – Joint Discovery Report and Initial Disclosures Due
- December 1, 2023 – Initial Pretrial Conference

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Cameron S. Reuber
PARTNER

In accordance with the Court's Notice of Initial Pretrial Conference, Tianhai has received Zara's consent to file this joint letter. The parties are available on December 1, 2023 at 10:00 AM, or such other date and time as is convenient for the Court.

Sincerely,



Cameron S. Reuber

Granted. The IPTC is rescheduled to 12/1/23 at 2:00PM in Courtroom 18B, 500 Pearl Street.



DENISE COTE
United States District Judge

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